

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: :
CARRIE RENEE WILSON, : NO. 18-21809-GLT
Debtor :
: Chapter 13

NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS

Please take notice that **MKS SERVICES, INC. d/b/a SERVPRO OF METRO PITTSBURGH EAST/SOUTH HILLS/MONROEVILLE**, a creditor and party-in-interest in the above captioned case, hereby appears in the above-captioned case by its counsel identified below; such counsel hereby enters their appearance pursuant to §1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b); and such counsel hereby request, pursuant to Rules 2002, 3017 and 9007 of the Federal Rules of Bankruptcy Procedure and §1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the following persons at the addresses, telephone and facsimile numbers indicated:

DAVID ABRAMS, ESQUIRE
ABRAMS LAW FIRM
12A N. Meadowcroft Ave.
Pittsburgh, PA 15216
Pa. Supreme Court No. 15983
Telephone: (412) 207-9520
Facsimile: (412) 207-9531

Please take further notice that, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made

with regard to the above-captioned case and proceedings herein.

This Notice of Appearance and Request for Notices and Service of Papers shall not be deemed or construed to be a consent to the jurisdiction of the Bankruptcy Court, an express consent to conduct of a jury trial by the Bankruptcy Judge, and/or a waiver of the above-named entity's rights (1) to have final orders in noncore matters entered only after de novo review by a District Court Judge, (2) to trial by jury in any proceeding or trial in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, setoffs, or recoupments to which the above-named creditor is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the above-named creditor and party-in-interest expressly reserves.

Attorney for MKS Services, Inc. d/b/a,
ServPro of Metro Pittsburgh East/South
Hills/Monroeville, Creditor

/s/David Abrams, Esquire
DAVID ABRAMS, ESQUIRE
ABRAMS LAW FIRM
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Facsimile: (412) 207-9531
Pa. Supreme Ct. #15983

DECLARATION IN LIEU OF AFFIDAVIT

REQUEST FOR NOTICE OF ENTRY OF ORDER

Regarding Request to be Added to the Mailing Matrix

I am the Attorney for MKS Services, Inc. d/b/a, ServPro of Metro Pittsburgh East/South Hills/Monroeville, a creditor in the above-captioned bankruptcy case, and I am authorized to make the accompanying request for notices. The new address should be used instead of the existing address and added to the matrix. I have reviewed the mailing matrix on file in this case and hereby certify that the request for notices being filed herewith replaces the creditor's address listed on the matrix, supersedes and cancels all prior requests for notice by the within-named creditor; and:

Please check the appropriate box.

- ☒ that there are no other requests to receive notices on behalf of this creditor; or
- ☐ that the following prior request(s) for notice by or on behalf of this creditor shall be deleted from the matrix.

I declare under penalty of perjury that this foregoing is true and correct.

Executed on July 2, 2018.

Attorney for MKS Services, Inc. d/b/a,
ServPro of Metro Pittsburgh East/South
Hills/Monroeville, Creditor

/s/David Abrams, Esquire
DAVID ABRAMS, ESQUIRE
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CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE AND REQUEST FOR NOTICES TO PARTIES IN INTEREST

I, DAVID ABRAMS, ESQUIRE, certify under penalty of perjury that I served the above captioned pleading Notice of Appearance and Request for Notices on the parties at the addresses listed below on the 2d day of July, 2018, in the following manner:

FIRST CLASS MAIL, POSTAGE FULLY PREPAID DEPOSITED FROM THE SOUTH HILLS BRANCH OF THE U.S. POSTAL SERVICE:

Albert G. Reese, Jr., Esquire
Law Office of Albert G. Reese, Jr.
640 Rodi Road, 2nd Floor
Suite 2
Pittsburgh, PA 15235

Ronda J. Winnecour, Esquire - Chapter 13 Trustee
Chapter 13 Trustee, W.D. PA
Suite 3250 USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the U.S. Trustee
1001 Liberty Plaza
Suite 970
Pittsburgh, PA 15222

SERVICE BY NEF:

See above.

The total number of parties served was 3.

EXECUTED ON: July 2, 2018

By: /s/David Abrams, Esquire
DAVID ABRAMS, ESQUIRE
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Pittsburgh, PA 15216
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